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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 TRUSTEES OF THE CONSTRUCTION  
9 INDUSTRY AND LABORERS HEALTH  
10 AND WELFARE TRUST; TRUSTEES OF  
11 THE CONSTRUCTION INDUSTRY AND  
12 LABORERS JOINT PENSION TRUST;  
13 TRUSTEES OF THE CONSTRUCTION  
14 INDUSTRY AND LABORERS VACATION  
15 TRUST; and TRUSTEES OF THE  
16 SOUTHERN NEVADA LABORERS  
17 LOCAL 872 TRAINING TRUST,

Case No. 2:09-cv-02252-LRH-LRL

18 **STIPULATED/CONSENT JUDGMENT  
19 AGAINST PREMIER TRAFFIC  
20 CONTROL, INC.**

21 Plaintiffs,

22 vs.  
23 PREMIER TRAFFIC CONTROL, INC., a  
24 Nevada corporation; EDITH MARTINEZ, an  
25 individual; and JANET L. GLENN, an  
26 individual,

27 AND ORDER THEREON

28 Defendants.

29 Plaintiffs, Trustees of the Construction Industry and Laborers Health and Welfare Trust,  
30 Trustees of the Construction Industry and Laborers Joint Pension Trust; Trustees of the  
31 Construction Industry and Laborers Vacation Trust and Trustees of the Southern Nevada Laborers  
32 Local 872 Training Trust (collectively “Trust Funds”), and Defendants, Premier Traffic Control,

1 Inc. (“Premier”), Edith Martinez (“Martinez”) and Janet L. Glenn (“Glenn”) (collectively  
 2 “Defendants”), hereby stipulate and agree as follows:

3 WHEREAS, Premier is signatory to and bound by the terms of a collective bargaining  
 4 agreement (“CBA”) with the Laborers International Union of North America, Local No. 872  
 5 (“Union”), in which Premier agreed to abide by the trust agreements establishing the respective  
 6 Trust Funds and any amendments thereto (“Trust Agreements”);

7 WHEREAS, under the CBA and the Trust Agreements, Premier is obligated to pay  
 8 employee benefits to the Trust Funds on behalf of Premier’s bargaining unit employees  
 9 represented by the Union;

10 WHEREAS, based on a contract compliance review (“Audit”) of Premier’s books and  
 11 records for the months of May 2005 through May 2009 (“Audit Period”), Premier owes the Trust  
 12 Funds delinquent employee benefit contributions and resulting interest, liquidated damages, Audit  
 13 costs and attorney’s fees and costs (collectively “ancillary costs”) incurred for hours worked by  
 14 Premier’s employees on various projects on which Premier performed work for numerous  
 15 general/originating contractors. As of September 30, 2010, Premier’s indebtedness for labor for  
 16 the Audit Period on projects for the following general/original contractors is as follows:

Contractor	Contr.	Int	LDs	Audit Costs	Atty F&C	Pymts	Balance
Acme Electric	\$3,483.80	\$1,058.37	\$1,058.37	\$50.82	\$237.18		\$5,888.53
Advanced Technology	\$445.48	\$200.78	\$200.78	\$6.50	\$30.33		\$883.86
Advanced Traffic	\$10,295.27	\$1,993.29	\$2,052.96	\$150.17	\$700.92		\$15,192.61
Arizona Pipeline	\$131.04	\$52.90	\$52.90	\$1.91	\$8.92		\$247.68
Blue Star Barricades	\$863.52	\$415.02	\$415.02	\$12.60	\$58.79		\$1,764.95
Bulldog Equipment	\$168.80	\$32.85	\$33.66	\$2.46	\$11.49		\$249.26
Capriati Construction	\$49,505.72	\$18,632.61	\$18,632.61	\$722.12	\$3,370.43		\$90,863.49
Clark Construction	\$51,490.56	\$20,430.33	\$20,430.33	\$751.08	\$3,505.56		\$96,607.85
Clark County Air Quality	\$1,900.08	\$656.70	\$656.70	\$27.72	\$129.36		\$3,370.56
Curtis Excavating	\$3,529.92	\$1,310.70	\$1,310.70	\$51.49	\$240.32		\$6,443.12

1	Dept of Air Quality & Environmental Management	\$1,570.84	\$871.97	\$871.97	\$22.91	\$106.95		\$3,444.63
2	Desert Plumbing & Heating	\$3,696.72	\$912.58	\$912.58	\$53.92	\$251.68		\$5,827.49
3	El Dorado Rock	\$2,287.94	\$831.00	\$831.00	\$33.37	\$155.77		\$4,139.07
4	Flippins Trenching	\$9,881.18	\$3,572.89	\$3,572.89	\$144.13	\$672.73		\$17,843.82
5	Hegwer Underground	\$6,033.18	\$2,971.55	\$2,971.55	\$88.00	\$410.75		\$12,475.03
6	Highway Technologies	\$196.56	\$86.18	\$86.18	\$2.87	\$13.38	(\$196.56)	\$188.62
7	Frehner Construction	\$889,987.84	\$364,324.01	\$364,324.01	\$12,981.98	\$60,591.76	(\$308,152.24)	\$1,384,057.36
8	Infrasource Transmission Services	\$6,232.62	\$2,497.36	\$2,497.36	\$90.91	\$424.33	(\$10,139.29)	\$1,603.29
9	Instiufom Technologies	\$1,038.97	\$1,066.78	\$1,066.78	\$15.16	\$70.73	(\$1,038.97)	\$2,219.45
10	Jaynes Corp.	\$1,907.44	\$384.52	\$384.52	\$27.82	\$129.86		\$2,834.17
11	Jeffery Robbins Electrical	\$203.19	\$103.28	\$103.28	\$2.96	\$13.83	(\$203.19)	\$223.36
12	Lone Mountain Excavating & Utilities	\$16,128.57	\$8,634.97	\$8,634.97	\$235.26	\$1,098.06	(\$16,128.57)	\$18,603.26
13	Marnell Corrao	\$1,114.08	\$222.58	\$222.58	\$16.25	\$75.85		\$1,651.33
14	Martin Harris	\$135.04	\$37.22	\$37.22	\$1.97	\$9.19		\$220.64
15	Mastec North America	\$589.68	\$243.75	\$243.75	\$8.60	\$40.15		\$1,125.92
16	Maui One Excavating	\$4,548.33	\$2,932.80	\$2,932.80	\$66.35	\$309.66		\$9,709.92
17	Meadow Valley Contractors	\$5,468.88	\$1,673.52	\$1,673.52	\$79.77	\$372.33		\$9,268.02
18	National Equipment Services	\$925.50	\$341.10	\$341.10	\$13.50	\$63.01		\$1,684.21
19	NU Equipment	\$979.04	\$281.11	\$281.11	\$14.28	\$66.65		\$1,622.19
20	Nevada Power Company	\$65.52	\$24.92	\$24.92	\$0.96	\$4.46		\$120.78
21	Rafael Construction	\$13,491.79	\$6,253.83	\$6,253.83	\$196.80	\$918.54	(\$5,000.00)	\$22,114.80
22	Rice Construction	\$703.35	\$402.95	\$402.95	\$10.26	\$47.89		\$1,567.39
23	Road & Highway Builders	\$166,946.34	\$37,513.40	\$37,513.40	\$2,435.19	\$11,365.97		\$255,774.30
24	Rowley	\$762.07	\$219.44	\$219.44	\$11.12	\$51.88		\$1,263.95
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1	Contracting	2	3	4	5	6	7
1	Sage Construction	\$733.32	\$332.92	\$332.92	\$10.70	\$49.93	\$1,459.78
2	Southern Nevada Construction	\$1,941.06	\$631.31	\$631.31	\$28.31	\$132.15	\$3,364.15
3	Southern Nevada Paving	\$143,691.04	\$40,232.49	\$40,232.49	\$2,095.98	\$9,782.71	(\$163,569.95)
4	Southwest Iron Works	\$9,330.43	\$2,359.25	\$2,359.25	\$136.10	\$635.23	\$14,820.26
5	Spirit Underground	\$163.80	\$56.67	\$56.67	\$2.39	\$11.15	(\$258.00)
6	Tab Contractors	\$92,302.99	\$34,781.24	\$34,781.24	\$1,346.40	\$6,284.13	\$169,496.00
7	Tand, Inc.	\$1,916.46	\$838.87	\$838.87	\$27.95	\$130.48	\$3,752.62
8	Taylor International	\$13,088.57	\$5,147.44	\$5,147.44	\$190.92	\$891.09	\$24,465.47
9	Traffic Control Service	\$1,304.99	\$526.55	\$526.55	\$19.04	\$88.85	\$2,465.97
10	Washington Group	\$4,949.00	\$2,973.33	\$2,973.33	\$72.19	\$336.94	\$11,304.79
11	Western States Contracting	\$25,624.66	\$8,687.30	\$8,687.30	\$373.78	\$1,744.57	\$45,117.60
12	Whiteford Construction	\$384.96	\$146.44	\$146.44	\$5.62	\$26.21	\$709.66
13	Wiser Construction	\$7,059.78	\$2,675.79	\$2,765.79	\$102.98	\$480.64	\$13,174.97
14	WPM Construction	\$9828	\$37.39	\$37.39	\$1.43	\$6.69	\$181.19

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17        WHEREAS, as of September 30, 2010, Premier owes the Trust Funds Two Million Three  
18 Hundred and Forty-Three Thousand Nine Hundred Four and 82/100 Dollars (\$2,343,904.82),  
19 which includes One Million Five Hundred Fifty-Nine Thousand Two Hundred Ninety-Eight and  
20 20/100 Dollars (\$1,559,298.20) in contributions, Five Hundred Eighty Thousand Two Hundred  
21 Eighteen and 74/100 Dollars (\$580,218.74) in liquidated damages, Five Hundred Eighty  
22 Thousand One Hundred Fifty-Eight and 26/100 Dollars (\$580,158.26) in interest, Twenty-Two  
23 Thousand Seven Hundred Forty-Five and 00/100 Dollars in Audit costs, and Seventy-Four  
24 Thousand Five Hundred Fifty-Four and 70/100 Dollars (\$74,554.70) in attorney's fees and costs,  
25 less amounts paid of Five Hundred Four Thousand Six Hundred Eighty-Six and 77/100 Dollars  
26 (\$504,686.77).  
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1           NOW THEREFORE, the parties agree to entry of Judgment against Premier and in favor  
2 of the Trust Funds in the total sum of Two Million Three Hundred and Forty-Three Thousand  
3 Nine Hundred Four and 82/100 Dollars (\$2,343.904.82), for delinquent employee benefit  
4 contributions and related ancillary costs owed to the Trust Funds for the period of May 2005  
5 through May 2009.

6           FURTHER, the parties agree that the Trust Funds' claims against Martinez and Glenn  
7 shall be dismissed without prejudice. Upon dismissal of these claims, Martinez and Glenn agree  
8 to waive any and all time related defenses only, including, but not limited to, the time-based  
9 defenses of statute of limitations, time-based estoppel, laches, and any other defense involving a  
10 time bar or issue of time-based waiver based upon insofar as any such defense is based on the  
11 passage of time, as to future claims that may be asserted by the Trust Funds against Martinez and  
12 Glenn for breach of fiduciary duty under ERISA related to the delinquencies described above for  
13 a period of five (5) years. The parties agree that Martinez and Glenn are not waiving any and all  
14 defenses that are not time-based, which include certain defenses of estoppel and waiver, and the  
15 parties further agree that nothing in this Stipulated/Consent Judgment Against Premier Traffic  
16 Control, Inc. and Dismissal of Edith Martinez and Janet L. Glenn shall be deemed to be an  
17 admission or acknowledgement of liability by Martinez and Glenn, the existence of damages, or  
18 the amount of any damages relating to any future claims that may be asserted by the Trust Funds  
19 against Martinez and Glenn.

20           FURTHER, the parties agree that the following claims are expressly reserved by the Trust  
21 Funds and not resolved in this case: (i) any claims for employee benefit contributions and related  
22 amounts owed by Premier to the Trust Funds for any period after May 2009; (ii) the obligation of  
23 Premier or any trade or business under common control of Premier (to the extent Premier or any  
24 trade or business under common control with Premier has any obligation) to pay, and the rights of  
25 the pension funds to assess and collect, withdrawal liability pursuant to 29 U.S.C. §1381 et seq.

1 (including use of Premier's contribution history for purposes of calculating any withdrawal  
2 liability); and (iii) any general (original) contractor claims pursuant to NRS 608.150, lien claims  
3 pursuant to NRS 108, pay and performance bond claims, licensing bond claims and any other  
4 ERISA or state law claim enforceable by the Trust Funds for any period.

5 FURTHER, Premier shall provide a copy of its QuickBooks backup for the period of June  
6 2009 through the present to the Trust Funds within twenty (20) days of entry of this Stipulation.

7 APPROVED AS TO FORM AND CONTENT.

8 *Dec.*  
November 1, 2010.

November 27<sup>th</sup>, 2010.

9 BROWNSTEIN HYATT FARBER  
10 SCHRECK, LLP

11  
12 Adam P. Segal, Esq.  
13 Nevada Bar No. 6120  
14 100 North City Parkway  
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16 Las Vegas, Nevada 89106  
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LAW OFFICE OF LADINE ORAVETZ

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20 Suite J  
21 Las Vegas, Nevada 89146  
22 (702) 220-3225

23 Attorneys for the Trust Funds

24 Attorneys for Defendants

25 **ORDER**

26 IT IS SO ORDERED.

27 Dated this 10th day of December, 2010.

*Larry R. Hicks*

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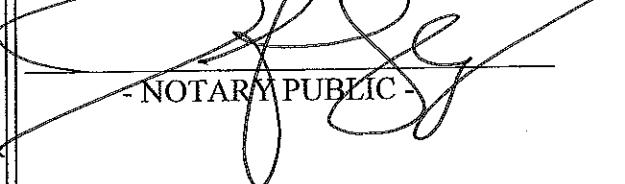
1 STATE OF NEVADA )  
2 ) ss.  
3 COUNTY OF CLARK )

4 Edith Martinez, being first duly sworn, deposes and says:

5 That she is an officer and representative of Premier Traffic Control, Inc., and is duly  
6 authorized to execute this document; that she has read the foregoing Stipulation for Entry of  
7 Judgment by Confession and knows the contents thereof; that the same is true of her own  
8 knowledge, except for those matters therein stated on information and belief, and as to those  
9 matters she believes them to be true.

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12 Affiant

13 Subscribed and sworn to before me  
14 this 23<sup>rd</sup> day of November, 2010.

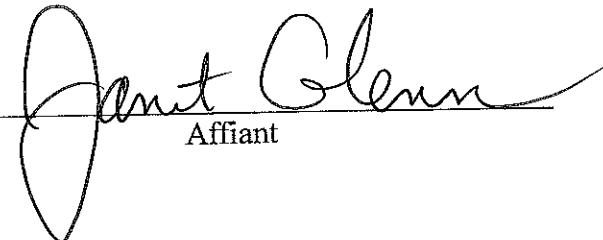
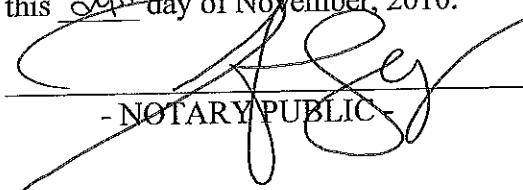
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1 STATE OF NEVADA )  
1 ) ss.  
2 COUNTY OF CLARK )

3 Janet L. Glenn, being first duly sworn, deposes and says:

4 That she is an officer and representative of Premier Traffic Control, Inc., and is duly  
5 authorized to execute this document; that she has read the foregoing Stipulation for Entry of  
6 Judgment by Confession and knows the contents thereof; that the same is true of her own  
7 knowledge, except for those matters therein stated on information and belief, and as to those  
8 matters she believes them to be true.

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12 Subscribed and sworn to before me  
13 this 24th day of November, 2010.  
14 - NOTARY PUBLIC  
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